

BASSETT LAW FIRM LLP
ATTORNEYS AT LAW
P.O. Box 3618
FAYETTEVILLE, ARKANSAS 72702-3618

W.W. "BILL" BASSETT (1924-2006)
WOODY BASSETT
TOD C. BASSETT
WM. ROBERT STILL, JR.
WALKER DALE GARRETT
CURTIS L. NEBBEN
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DALE W. BROWN
JENNIFER E. LLOYD

221 NORTH COLLEGE AVENUE
TELEPHONE (479) 521-9990
TELECOPIER (479) 521-9600
www.bassettlawfirm.com

*ALSO LICENSED
IN OKLAHOMA

ALSO LICENSED
IN MISSOURI

LINDA DOVER
OFFICE MANAGER

September 10, 2007

RE: State of Oklahoma v. Tyson, et al.
USDC ND Oklahoma
Case No.: 05-CV-00329-GKF-SAJ

Robert A. Nance
Riggs, Abney, Neal,
Turpen, Orbison & Lewis
The Paragon Building Suite 101
5801 Broadway Extension
Oklahoma City, Oklahoma 73118-7489

Dear Bob:

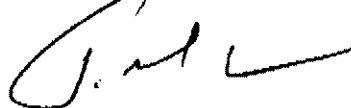
Thank you for your September 7, 2007 correspondence. As you have indicated is the case with Cargill, we too are reluctant to consolidating any Rule 30(b)(6) depositions. We will have topics and questions that are specific to George's, and our Notice(s) will likely differ in some substantive ways as a result.

Accordingly, at this time we cannot agree to consolidation of such depositions, and would suggest that you move forward with scheduling the State witnesses implicated by Cargill's Notices at this time.

Please let me know if you have any further questions.

Sincerely,

BASSETT LAW FIRM LLP



James M. Graves

JMG/jea



YOUNG WILLIAMS P.A.

Attorneys at Law
2000 AmSouth Plaza
Jackson, Mississippi 39201
Post Office Box 23059
Jackson, Mississippi 39225-3059
Telephone 601.948.6100
Fax 601.355.6136
www.youngwilliams.com

J. Wesley Daughdrill, Jr.

Sean Wesley Ellis

Michael Farrell

Stephen E. Carduer

Don H. Goode

Robert L. Holladay, Jr.

Jay M. Kilpatrick

John Sanford McDavid

James H. Neeld, III

James H. Neeld, IV

Erin S. Rodgers

Robert E. Sanders

Lindsay G. Watts

Robert L. Wells

E. Stephen Williams

James Leon Young,

Of Counsel

J. Will Young,

1906-1996

Tony Carlisle,

Administrator

September 13, 2007

--- via e-mail ---

Bob Nance
Riggs, Abney, etc.
502 West Sixth Street
Tulsa, OK 74119-1010

re: Oklahoma v. Tyson Foods, et al.,
Civil Action No. 4:05cv329-JOE-SAJ

Dear Mr. Nance,

I am responding to your letter of September 7 regarding Cargill's deposition notices to the plaintiff. As I appreciate Cargill's notices, the areas of inquiry appear to be Cargill-specific. Also, Cargill has apparently rejected the notion of having its deposition notices joined by other defendants. Accordingly, Cal-Maine has no interest in attempting to consolidate Cal-Maine depositions of the plaintiff with the depositions noticed by Cargill.

Sincerely,

Robert E. Sanders

RES/vs

KUTAK ROCK LLP

**THE THREE SISTERS BUILDING
214 WEST DICKSON STREET**

FAYETTEVILLE, ARKANSAS 72701-5221

479-973-4200

FACSIMILE 479-973-0007

www.kutakrock.com

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SCOTTSDALE
WASHINGTON
WICHITA

LITTLE ROCK OFFICE

SUITE 2000

124 WEST CAPITOL AVENUE

LITTLE ROCK, ARKANSAS 72201-3708

501-975-3000

MICHAEL R. BOND
michael.bond@kutakrock.com
(479) 973-4200

September 13, 2007

VIA E-MAIL

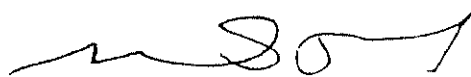
Mr. Robert Nance
Riggs, Abney, Neal, Turpen, Orbison & Lewis
502 West Sixth Street
Tulsa, Oklahoma 74119

Re: *Oklahoma, et al. v. Tyson Foods, et al.*
U.S. District Court No. 05-00329 GKF-SAJ

Dear Bob:

We are in receipt of your letter dated September 7, 2007, concerning Defendant Cargill's 30(b)(6) deposition notices to the Plaintiffs. Our understanding of Cargill's notices is that they are specific to Cargill and that Cargill desires that the notices and the depositions taken thereunder remain that way. The Tyson Defendants do not wish to consolidate its currently unnoticed 30(b)(6) depositions of the Plaintiffs with the depositions noticed by Cargill.

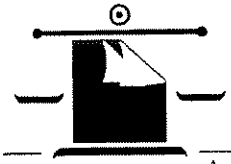
Sincerely,



Michael R. Bond

Mrb

cc: All counsel of record



McDANIEL,
HIXON,
LONGWELL &
ACORD, PLLC
ATTORNEYS AND COUNSELORS

320 S. Boston Ave,
Suite 700,
Tulsa, Oklahoma 74103

- Office: (918) 382-9200
- Facsimile: (918) 382-9282

September 13, 2007

Via E-mail

Robert A. Nance
Riggs Abney
5801 N. Broadway, Suite 101
Oklahoma City, OK 73118

Re: Oklahoma
Inquiry Regarding 30(b)(6) Depositions

Dear Bob:

This responds to your letter of September 7 inquiring whether or not Peterson Farms would be interested in consolidating its deposition of the Plaintiff in this matter with the other Defendants. Your inquiry was prompted by the 30(b)(6) Notices served on the Plaintiff by the Cargill defendants. We respectfully decline your offer.

It appears from the Notices that the Cargill defendants desire and are prepared to take the deposition(s) of the Plaintiff on topics specific only to the Cargill defendants. The procedure they are pursuing appears both permissible and proper under the Rules. Peterson Farms is not in a position at this time to take 30(b)(6) depositions of the Plaintiff with regard to the allegations made against it, and it has no desire to cause a delay in the Cargill defendants' plan to conduct these depositions now. Peterson Farms has the prerogative to take depositions of the Plaintiff's representatives to determine what, if any basis the Plaintiff had for suing it, and will do so at a time of its choosing when, and if, the Plaintiff fully complies with its discovery obligations.

Best regards,

McDANIEL, HIXON, LONGWELL & ACORD, PLLC



A. Scott McDaniel

ASM:jlw

cc: Plaintiff and Defendant Counsel of Record (*Via E-mail*)

CONNER & WINTERS

ATTORNEYS & COUNSELORS AT LAW

Conner & Winters, LLP
211 East Dickson Street
Fayetteville, Arkansas 72701

479-582-5711

Fax 479-587-1426

www.cwlaw.com

Writer's E-mail Address
vbrownson@cwlaw.com

NORTHWEST ARKANSAS

John R. Elrod*
Greg S. Scharlau
Terri Dill Chadick
Vicki Bronson
Todd P. Lewis*
P. Joshua Wisley
Kern E. Kobbenan**

Charles E. Scharlau*

TULSA

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Lynnwood R. Moore, Jr.
Robert A. Cury
Steven W. McGrath
D. Richard Funk
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J. Ronald Petrikin
Larry B. Lipe
James E. Green, Jr.
Martin R. Wing
John W. Ingraham
Andrew R. Turner
Gentra Abbey Sorem
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WASHINGTON, D.C.

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HOUSTON, TEXAS

Gregory D. Remberg

JACKSON, WYOMING

Randolph L. Jones, Jr.

SANTA FE, NEW MEXICO

Douglas M. Rather

Benjamin C. Conner
1879-1963
John M. Winters, Jr.
1901-1959

*Not Admitted in Oklahoma
**Not Admitted in Arkansas

September 17, 2007

VIA E-MAIL

Bob Nancy
Riggs, Abney, Neal, Turpen,
Orbison & Lewis
The Paragon Bldg., Suite 101
5801 Broadway Extension
Oklahoma City, OK 73118-7489

Re: *State of Oklahoma v. Tyson Foods, Inc., et al*

Dear Bob:

I am in receipt of your letter dated September 7, 2007, in which you asked whether we want to consolidate any 30(b)(6) depositions of the Plaintiff that we may want to take with the 30(b)(6) depositions noticed by Cargill. We are not interested in doing so. The topics contained in the 30(b)(6) notices issued by Cargill are very specific to Cargill. Likewise, if Simmons desired to conduct similar 30(b)(6) depositions of the Plaintiff the topics would be very specific to Simmons. Thus, the topics are impossible to consolidate.

Sincerely,



Vicki Bronson

cc: Counsel of record